

EXHIBIT 1

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Andrew J. Rossman
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Tyler G. Whitmer
QUINN EMANUEL URQUHART & SULLIVAN, LLP
Counsel to Lehman Brothers Holdings Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	Case No. 08-13555 (SCC)
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	
	:	
Debtors.	:	
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**DECLARATION OF TYLER G. WHITMER IN SUPPORT OF MOTION FOR
SANCTIONS AGAINST WILLIAM KUNTZ III**

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

I, Tyler G. Whitmer hereby declare under penalty of perjury:

1. I am a partner with Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”), counsel for Lehman Brothers Holdings Inc. (“LBHI”), movant in the above-captioned action.

2. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 4 is a true and correct copy of a facsimile sent by William Kuntz III (“W. Kuntz”) to Wachtell, Lipton, Rosen & Katz (“Wachtell”) on February 6, 2016 and subsequently forwarded to me by Wachtell.

3. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 5 is a true and correct copy of a facsimile sent by W. Kuntz to Wachtell on February 13, 2016 and subsequently forwarded to me by Wachtell.

4. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 6 is a true and correct copy of a facsimile sent by W. Kuntz to Quinn Emanuel on February 17, 2016.

5. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 7 is a true and correct copy of an email sent by W. Kuntz to myself and others on February 19, 2016.

6. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 8 is a true and correct copy of an email sent by W. Kuntz to myself and others on February 19, 2016.

7. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 10 is a true and correct copy of an email sent by W. Kuntz to myself and others on February 22, 2016.

8. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 11 is a true and correct copy of an email sent by W. Kuntz to myself and others on February 23, 2016.

9. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 12 is a true and correct copy of an email sent by W. Kuntz to myself and others on February 23, 2016.

10. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 13 is a true and correct copy of an email sent by W. Kuntz to myself and others on February 23, 2016.

11. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 14 is a true and correct copy of an email sent by W. Kuntz to myself and others on February 23, 2016.

12. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 23 is a true and correct copy of an email sent by W. Kuntz to myself and others on February 24, 2016.

13. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 24 is a true and correct copy of an email sent by W. Kuntz to myself and others on February 24, 2016.

14. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 25 is a true and correct copy of a letter sent by W. Kuntz to the Court dated February 25, 2016, which was forwarded to me from Wachtell on February 29, 2016.

15. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 26 is a true and correct copy of an email sent by W. Kuntz to myself and others on March 2, 2016.

16. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 27 is a true and correct copy of an email sent by W. Kuntz to myself and others on March 2, 2016.

17. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 28 is a true and correct copy of an email sent by W. Kuntz to myself and others on March 3, 2016.

18. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 29 is a true and correct copy of an email sent by William Pugh to W. Kuntz, myself and others on February 16, 2016.

19. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 30 is a true and correct copy of an email sent by myself to W. Kuntz on February 17, 2016.

20. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 31 is a true and correct copy of an email sent by William Pugh to W. Kuntz, myself and others on February 19, 2016.

21. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 32 is a true and correct copy of an email sent by Benjamin Odell to W. Kuntz, myself and others on February 23, 2016.

22. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 33 is a true and correct copy of an email sent by Benjamin Odell to W. Kuntz, myself and others on February 24, 2016.

23. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 37 is a true and correct copy of the Claims Register reflecting the expungement of the claims of W. Kuntz (Nos. 10509, 10510, 10511, 33550, 33551, 33552, 35120, 35121, 35122, 35123, 35340) in this matter.

24. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 38 is a true and correct copy of the transcript of the March 1, 2016 Hearing in this matter regarding the Status Conference on Doc #52113 Motion for Sanctions Against William Kuntz III.

25. Attached to the *Exhibit List For Hearing On Motion For Sanctions Against William Kuntz III* as Exhibit 39 is a true and correct copy of the Electronic Docket reflecting the filings of W. Kuntz and related documents in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 4, 2016



Tyler G. Whitmer